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EPA Region 5 Records Ctr.



355856

July 20, 1989

Mr. Harish Narayan
Illinois Environmental Protection Agency
1701 South First Avenue - Suite 600
Maywood, IL 60153

Re: Air Emissions Regulatory Applicability

We have reviewed Subparts Q, AA, and RR to Part 215 pertaining to Air Emissions Compliance Programs for Volatile Organic Emissions and believe that only Subpart AA is applicable to the Sherwin-Williams Chemical Coatings Division - Permits 72100426 and 82110038. Rationale for our position and the state of compliance with Subpart A follows:

Subpart Q - Not applicable. We use, but do not manufacture any of the chemicals listed in Appendix D to Section 215.

Subpart AA - Applicable to both our Paint and Resin Facilities. Solvent tanks identified in the Resin permit also supply solvents to the Paint plant. In addition, there are pipelines from the Resin facility to the Paint plant containing fluid that is 10% volatile organic material by weight.

Status of Compliance

Section 215.624: Covers are available and in use for all mills, tanks or vessels. Emphasis by plant management is necessary to insure continued compliance.

Section 215.625: All grinding mills are in compliance.

Section 215.628: Leak detection programs are in being. Documentation of inspections and follow-up maintenance was not being accomplished as prescribed and use of tags was sporadic. The program has received increased emphasis through the designation of specific personnel with inspection and monitoring responsibilities. Compliance date - 19 July 1989.

Section 215.630: Filling machines are cleaned with organic solvent on the floor where used. For safety purposes, the machines are not covered during cleaning.

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